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February 21, 2025

VIA ECF

The Honorable Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse, S.D.N.Y.
500 Pearl Street
New York, NY 10007

MEMO ENDORSED


HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 2/24/25

Parties interested in permanently sealing the documents are directed to make a showing under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) by March 31, 2025. The Clerk of Court is directed to terminate the gavel at ECF No. 767.

RE: *Vinci Brands, LLC v. Coach, Inc., et al.*, Civil Action No. 1:23-cv-05138-LGS
Case Mate's Letter Motion to Seal

Dear Judge Figueredo:

Pursuant to Rule I.g.2 of Your Honor's Individual Practices in Civil Cases, Case-Mate, Inc. ("Case-Mate") respectfully requests Your Honor's approval to file under seal Case-Mate's Answer and Defenses to Vinci Brand, LLC's Third Amended Complaint and Amended Counterclaim, including Exhibits 1–4. [ECF 766]

Case-Mate seeks to seal the Answer and Exhibits 1–4 because the Answer quotes from, relies upon, and attaches documents the parties marked in discovery as either "Confidential" or "Highly Confidential – Attorney Eyes Only" under the Stipulation and Confidentiality Agreement and Order [ECF 233] (the "Confidentiality Stipulation"). As to Exhibit 4, which is the Loan Sale Agreement, Case-Mate marked it as Highly Confidential – Attorneys' Eyes Only at the outset of discovery. Although Case-Mate hereby reclassifies it as "Confidential," it should remain sealed as it was also marked as Confidential by Siena, a non-party to this suit. The Loan Sale Agreement contains non-public information regarding a confidential business transaction between Case-Mate and Siena. Release of this information could be harmful to Siena, which is in the business of making and selling loans.

To ensure its compliance with the Confidentiality Stipulation, the Answer with Exhibits 1–4 are submitted with this Letter Motion to Seal for the Court's consideration.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Erika C. Birg
Erika C. Birg (Counsel for Case-Mate, Inc.)